

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

Parker Tirrell, by her parents and next friends Sara Tirrell  
and Zachary Tirrell, *and*

Iris Turmelle, by her parents and next friends Amy  
Manzelli and Chad Turmelle,

Plaintiffs,

v.

Donald J. Trump, *in his official capacity as President of  
the United States,*

U.S. Department of Justice,

Pamela Bondi, *in her official capacity as Attorney General  
of the United States,*

U.S. Department of Education,

Denise L. Carter, *in her official capacity as Acting  
Secretary of the United States Department of Education,*

Frank Edelblut, *in his official capacity as Commissioner of  
the New Hampshire Department of Education;*

Andrew Cline, Kate Cassady, Ann Lane, Philip Nazzaro,  
Rajesh Nair, James Fricchione, and James Laboe, *in their  
official capacities as members of the New Hampshire  
State Board of Education;*

Pemi-Baker Regional School District; *and*

Pembroke School District,

Defendants.

Civil Action No. 1:24-cv-00251-  
LM-TSM

**JOINT MOTION TO STAY**

Plaintiffs Parker Tirrell and Iris Turmelle (“Plaintiffs”) and Defendants Frank Edelblut,  
Andrew Cline, Kate Cassady, Ann Lane, Philip Nazzaro, Rajesh Nair, James Fricchione, James

Laboe, Pemi-Baker Regional School District, and Pembroke School District (“State and School Defendants”) submit this joint motion in response to the Court’s Order that the parties meet and confer regarding an updated scheduling order. The Plaintiffs and State and School Defendants jointly move to stay all deadlines in this case until the new federal defendants added in the Plaintiffs’ Second Amended Complaint have filed a responsive pleading and all parties subsequently confer on an updated scheduling order.

As grounds for this Motion, the Parties state the following:

1. On February 12, 2025, Plaintiffs filed an Unopposed Motion to File a Second Amended Complaint, which this Court granted by its Endorsed Order. *See* ECF No. 94. In its Endorsed Order, this Court ordered that the parties shall meet and confer regarding an updated scheduling order. Plaintiffs filed their Second Amended Complaint on February 12, 2025. ECF No. 95.
2. The Second Amended Complaint added claims against five new Defendants: Donald J. Trump, in his official capacity as President of the United States, U.S. Department of Justice, Pamela Bondi, in her official capacity as Attorney General of the United States, U.S. Department of Education, and Denise L. Carter, in her official capacity as Acting Secretary of the United States Department of Education (the “Federal Defendants”). Counsel for the various Federal Defendants have not yet appeared.<sup>1</sup>
3. The Plaintiffs and State and School Defendants request that the Court stay all deadlines in this case until such time as the Federal Defendants file a responsive pleading and the parties confer regarding an updated scheduling order.

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<sup>1</sup> Because no counsel for any Federal Defendant has appeared, the Plaintiffs and State and School Defendants have not consulted them about this Motion. As a courtesy, Plaintiffs’ counsel has provided a copy of this Motion to the Civil Chief of the United States Attorney’s Office.

Dated: February 21, 2025

Respectfully submitted,

PARKER TIRRELL, by her parents and next friends SARA TIRRELL and ZACHARY TIRRELL,

and

IRIS TURMELLE, by her parents and next friends AMY MANZELLI and CHAD TURMELLE,

By and through their attorneys,

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**CERTIFICATE OF SERVICE**

I, Bennett H. Klein, certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 21, 2025.

/s/ Bennett H. Klein